

AO 91 (Rev. 11/11) Criminal Complaint

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6/17/16

UNITED STATES DISTRICT COURT
 for the
 Southern District of Texas

United States Courts
 Southern District of Texas
FILED

JUN 17 2016

United States of America

v.

Jared Hanson

Case No.

David J. Bradley, Clerk of Court

H16-921 M

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 8, 2016 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2252A (a)(2)(B)	Distribution of child pornography.

This criminal complaint is based on these facts:

See attached Affidavit.

Continued on the attached sheet.

Complainant's signature

Robert J. Guerra, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: June 17, 2016

Judge's signature

City and state: Houston, Texas

Stephen Wm. Smith, USMJ

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Robert J. Guerra, being duly sworn, hereby depose and state the following:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI) and have been so employed since November 2005. I am charged with the duty of investigating violations of the laws of the United States, collecting evidence in cases in which the United States is or may be a party in interest and performing other duties imposed by law. During my assignment with the FBI I have participated in the execution of search warrants for documents and other evidence, including computers and electronic media, in cases involving child pornography and the sexual exploitation of children. I have investigated many cases involving child pornography and the sexual exploitation of children. I have also participated in various FBI mandated and volunteer training for the investigation and enforcement of federal child pornography laws in which computers were used as the means for receiving, transmitting and storing child pornography as defined in Title 18, United States Code, Section 2256.
2. This affidavit is submitted for the limited purpose of establishing probable cause in support of the attached Complaint and therefore contains only a summary of the relevant facts. I have not included each and every fact known by me concerning the individuals and events described herein. The information contained in this affidavit is based on my firsthand knowledge as well as information obtained through witness interviews conducted by me or other Law Enforcement Officers or Special Agents of the FBI and a review of various records.

3. A growing phenomenon on the Internet is peer to peer file sharing (hereinafter, "P2P"). P2P file sharing is a method of communication available to Internet users through the use of special software. The software is designed to allow users to trade digital files through a worldwide network that is formed by linking computers together.
4. On or about June 8, 2016, Federal Bureau of Investigation (FBI) Special Agent Robert Guerra, using a computer connected to the Internet and utilizing a law enforcement tool that allows single-source downloads from the BitTorrent P2P network, conducted an investigation into the sharing of child pornography through that network.
5. SA Guerra identified a computer on the BitTorrent P2P file sharing network with the IP address of 98.197.42.77 as a potential download candidate (source) for several files of investigative interest. SA Guerra directed his investigation to this computer at IP address 98.197.42.77 as it had been detected as being associated with investigative files of interest by investigators conducting keyword searches or hash value searches for files related to child exploitation material including child pornography on the BitTorrent network.
6. On June 8, 2016 between the times of 13:07:03 (GMT -05:00) and 23:51:16 (GMT -05:00), SA Guerra successfully completed the download of 20 video files via single source download, which the computer at IP address 98.197.42.77 was making available. Following the downloads, your Affiant viewed the files downloaded from the computer at IP address 98.197.42.77 and determined that each respective file depicted child pornography as defined by Title 18 United States Code 2256. Below is a description of

5 of the downloaded files that meet the federal definition of child pornography and their respective hash value:

- a) **2009 Gracel Series hard blowjob (with cum).mpg** – This is video file that is 46 seconds in length depicting an underage female, who appears to be under the age of 12, being orally penetrated by an adult male's penis.
- b) **blowjob part1.mpg** – This is video file that is 46 seconds in length depicting an underage female, who appears to be under the age of 12, being orally penetrated by an adult male's penis.
- c) **doggystyle.mpg** – This is video file that is 1 minute and 4 seconds in length depicting an underage female, who appears to be under the age of 12, being vaginally penetrated by an adult male's penis.
- d) **pussy.mpg** – This is video file that is 1 minute and 46 seconds in length depicting an underage female, who appears to be under the age of 12, being digitally penetrated by an adult male's finger.
- e) **Gracel Set 40.mpg** – This is video file that is 6 minutes and 23 seconds in length depicting an underage female, who appears to be under the age of 12, being orally penetrated by an adult male's penis.

7. SA Guerra determined that the IP address 98.197.42.77 is registered to the Internet Service Provider (ISP) Comcast Communications. On June 10, 2016, Comcast Communications responded to an administrative subpoena and provided account information for IP address 98.197.42.77 assigned on June 8, 2016 between the times of 13:07:03 (GMT -05:00) and 23:51:16 (GMT -05:00), IP address 98.197.42.77 was assigned to an account registered to Heritage Family Church in Katy, Texas. The account in question was regarded as being in an active status as of July 27, 2015.

8. On June 17, 2016, FBI Houston executed a federal search warrant at a residence located on the property of the Heritage Family Church in Katy, Texas. Upon the execution of

said search warrant, it was determined the occupants of the residence were not involved in the distribution of child pornography. There was however a trailer on the property containing two occupants. One of the occupants was identified as Jared Hanson.

9. Jared Hanson, hereinafter referred to as "Hanson", was encountered and, after being advised of his *Miranda Rights*, agreed to make a statement. Hanson advised that he had utilized the BitTorrent Peer-To-Peer program to download digital media to include child pornography, while connected to the Heritage Family Church's wireless internet access point. After downloading child pornography, Hanson would view, masturbate and then delete the child pornography videos off of his laptop computer. Child pornography was something that peaked Hanson's curiosity, which then led him to conduct searches in order to find it and he would subsequently download and view the child pornography. Hanson estimated he had been downloading and viewing child pornography for the past few months.
10. Hanson acknowledged an understanding of peer-to-peer programs with regard to having to conduct keyword searches for a topic of interest and then having to actively select and approve the desired files for download and receipt. Hanson also acknowledged an understanding that peer-to-peer programs are file sharing programs that are based on users sharing files with other users. Although Hanson attempted to take steps to prohibit his BitTorrent program from sharing child pornography files, he was aware that by using the program, others were able to download child pornography from his shared folder.
11. Your affiant presented Hanson with the option to review two contact sheets which contained several still images of the videos (as described in paragraph 6) that SA Guerra

had downloaded from a computer connected to the IP address registered to the Heritage Church. Hanson agreed to review the contact sheets and subsequently stated that he recognized all the still images as child pornography he had previously downloaded, viewed and distributed from his laptop computer while connected to the Heritage Family Church's internet connection.

CONCLUSION

12. Based on all information set forth above, your Affiant believes there is probable cause to believe that on or about June 8, 2016, Jared Hanson, was in violation of Title 18 U.S.C. § 2252A (a)(2)(B) the distribution of child pornography.



Robert J. Guerra, SA, FBI

Subscribed and sworn before me this 17th day of June 2016.



Stephen Wm. Smith
United States Magistrate Judge